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5 6	Attorney for Plaintiff and Counter-defendant Medical Development International	
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9	UNITED STATES D	DISTRICT COURT
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13	MEDICAL DEVELOPMENT	CASE NO. 3:10-cv-00443-TEH
14	INTERNATIONAL, a Delaware corporation,	STIPULATION AND [PROPOSED]
15	Plaintiff,	ORDER DISMISSING THE ENTIRE ACTION WITH PREJUDICE
16	V.	
17 18	THE CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION; J. CLARK KELSO, in his capacity as receiver; and	
19	DOES 1 – 20, inclusive,	
20	Defendants.	
21	J. CLARK KELSO, in his capacity as receiver,	
22	Counter-claimant,	
23	v.	
24	MEDICAL DEVELOPMENT	
25	INTERNATIONAL, a Delaware corporation,	
26	Counter-defendant.	
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STIPULATION AND [PROPOSED] ORDER

IT IS HEREBY STIPULATED, by and between Plaintiff and Counter-defendant		
Medical Development International ("MDI"), Defendant California Department of Corrections		
and Rehabilitation ("CDCR"), and Defendant and Counter-claimant J. Clark Kelso, in his		
capacity as receiver that the entire above-captioned action, including all claims and counter-		
claims, be dismissed with prejudice pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of		
Civil Procedure. The parties shall bear their own fees and costs. The check for full settlement		
was sent by overnight mail from the CDCR on December 13, 2011, received by counsel for		
MDI on the morning of December 14, 2011 and then immediately transmitted to overnight		
carrier on December 14, 2011, prior to receipt of the subsequent Notice of Attorneys' Fee Lien		
filed by Watt, Tieder, Hoffar & Fitzgerald.		

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Dated: December 16, 2011

By:/s/ Jeremy A. Meier Jeremy A. Meier 15

Attorney for Plaintiff and Counterdefendant

Medical Development International

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ATTORNEY GENERAL'S OFFICE

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By:/s/ Michelle M. Mitchell

19 20 Kamala D. Harris Constance L. Lelouis Michelle M. Mitchell

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Attorneys for Defendant California Department of Corrections and Rehabilitation

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Dated: December 16, 2011 FUTTERMAN, DUPREE, DODD,

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CROLEY, MAIER, LLP

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By:/s/ Jamie L. Dupree Martin H. Dodd

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Jamie L. Dupree Attorneys for Defendant and Counter-claimant Receiver J. Clark Kelso

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Case No. 3:10-cv-00443-TEH

1	PURSUANT TO STIPULATION, IT IS SO ORDERED. TES DISTRICT
2	PURSUANT TO STIPULATION, IT IS SO ORDERED.
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5	United Staty Ludge Thelton E. Henderson
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STIPULATION AND [PROPOSED] ORDER DISMISSING THE ENTIRE ACTION WITH PREJUDICE